

REMARKS

Claims 1 through 20 are pending in this application.

I. REJECTION OF CLAIMS (35 U.S.C. § 103)

Claims 1-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Applicant's Prior Art (Fig. 1) in view of Hansell, III et al. (USPN 5,176,538). The Applicant respectfully traverses.

According to MPEP 706.02(j), the following establishes a *prima facie* case of obviousness under 35 U.S.C. §103:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The Examiner states that Applicant's prior art discloses a flat panel displaying apparatus that is basically the same as that recited in claim 1 except for a reinforcement connector connected to said ground portion and supporting the ground of said printed circuit board. The Examiner further states that as shown in Figs. 1-3, Hansell discloses a cable connector module having a reinforcement connector. However, the Examiner failed to mention that Hansell teaches or suggests the reinforcement connector *supporting the ground of said printed circuit board* as mentioned for example in claim 1 of the present invention. As seen in figures 1 through 3, no ground is shown to support the ground of the printed circuit board. Even if figure 1 of the present invention is used to modify Hansell, still there is no teaching or suggestion of supporting the ground of the printed circuit board. The Federal Circuit has mentioned that “[t]he test for obviousness is not whether the features of one reference may be bodily incorporated into another reference...Rather, we look to see whether combined teachings render the claimed subject matter obvious.” *In re Wood*, 599 F.2d 1032, 202 USPQ 171, 174 (CCPA 1979) (citing *In re Bozek*, 416 F.2d 1385, 1390, 163 USPQ 545, 549-50 (CCPA 1969); *In re Mapelsden*, 329 F.2d 321, 322, 141 USPQ 30, 32 (CCPA 1964). Taking a reinforcement connector and a ground of a printed circuit together does not give a teaching supporting the ground of the printed circuit as seen in the presently claimed invention.

Furthermore, the Examiner is talking about the reinforcement connector being related to the module 1 of Hansell with body 2 and spring ground fingers. However, this would then teach away from the presently claimed invention in that the reinforcement members are not claimed in cable connector but connected to the ground portion and supporting the ground of the printed circuit board.

A reference may be said to teach away when a person of ordinary skill, upon reading a reference, would be discouraged from following the path set out in the reference, or would be led in a direction divergent from the path that the applicant took. *In re Gurley*, 27 F.3d 551, 31 USPQ 2d 1130, 1131 (Fed. Cir. 1994). As mentioned in claim 2 of the present invention, the reinforcement connector connects to the connection cable and not the other way around as seen in Hansell.

The Examiner states that Hansell teaches a cover (top of the body 2) provided in said connector body, opening and closing said housing portion, to fasten said connection cable in said housing portion. However, looking at Hansell at all of the figures, no such structure is taught or suggested. A cover that opens and closes the housing portion to fasten the connection cable is not taught or suggested as claimed in the present invention. Instead, Hansell teaches of "The signal 19 and ground 17 pins are part of the header 20 that extends from the printed circuit board 21." Therefore, looking at figure 2 of Hansell, no such description of the cover is taught or suggested. The module 1 is simply inserted inside the cavity of header of the printed circuit board 21.

The Examiner states that Hansell teaches that the spring ground finger is mechanically stressed prior to ground pin insertion thus enabling it to achieve a high normal force and ensuring reliability and environmental stability when engaged (col. 3, lines 40-45). However, the reinforcement connector is not set to "support" the ground of the printed circuit board. All Hansel

teaches is the ground pins engaging with the ground spring finger. col. 4, lines 5-7. There is no teaching of the support.

The Examiner stated that Fig. 1 of Hansell also shows a second reinforcement connector connected to the connection cable. Therefore, the Examiner stated that accordingly, a plurality of reinforcement connectors can be used for grounding and receiving data signals from the external system to the printed circuit board. However, as seen in figure 1, only the internal connections of the module 1 is involved as being "reinforced." There is no reinforcement member that supports and reinforces the ground connection with the printed circuit board, but Hansel only involves the internal configurations of the connector without any further teaching or suggestion. On the other hand in claim 5 of the present invention, a second reinforcement connector connects to the connection cable and supports the ground of the printed circuit board.

The Examiner stated that with respect to claims 17-20, according to the structure of the cable connector module of Hansell, the top cover of the housing 2 is to be lifted for inserting the connection cable 10 having a ground pin 17 then to be closed for engaging a ground contact of the reinforcement connector with the ground pin. However, looking at Hansell, no such description is taught or suggested. According to MPEP §706.02(j), the teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Further as mentioned above, the Examiner is correlating the opposite part of Hansell to the present invention. The Examiner is using module 1 instead of the connection portion adjacent to the printed circuit board.

Instead, Hansell teaches of “The signal 19 and ground 17 pins are part of the header 20 that extends from the printed circuit board 21.” Therefore, looking at figure 2 of Hansell, no such description of movement is shown. The module 1 is simply inserted inside the cavity of header of the printed circuit board 21.

Further, as mentioned in claim 17, the reinforcement connector is disposed adjacent to a connector of a liquid crystal display. Clearly, Hansell does not teach or suggest such a disposition.

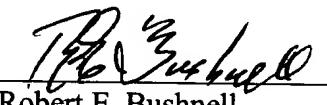
The first point in MPEP 706.02(j) states that there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. “Combining prior art references without evidence of such a suggestion, teaching, or motivation simply takes the inventor’s disclosure as a blueprint for piecing together the prior art to defeat patentability. *In re Dembicza*k, 175 F.3d 994, 50 USPQ.2d 1614 (Fed. Cir. 1999). The showing must be “clear and particular” without broad generalized conclusory statements. *Id.* There must be specific statements showing the scope of the suggestion, teaching, or motivation to combine the prior art references. *Id.* at 1000. There must be an explanation to what specific understanding or technical principle would have suggested the combination of references. *Id.* The Examiner stated that it would have been obvious to one having ordinary skill in the art at the time the invention was made to modify the flat panel display apparatus

of Applicant's Prior Art of with the teaching of Hansell by employed a reinforcement connector connected to the ground portion and supporting the ground of the printed circuit board for enabling to achieve a high normal force and ensuring reliability and environmental stability when engaged with the connection cable. Respectfully according to *In re Dembicza*k the motivation for the modification is a generalized conclusory statement.

In view of the foregoing amendments and remarks, all claims are deemed to be allowable and this application is believed to be in condition to be passed to issue. If there are any questions, the examiner is asked to contact the applicant's attorney.

No fee is incurred by this Response. Should there be a deficiency in payment, or should other fees be incurred, the Commissioner is authorized to charge Deposit Account No. 02-4943 of Applicant's undersigned attorney in the amount of such fees.

Respectfully submitted,



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